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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

STORMSMEDIA, LLC,  
  
Plaintiff,

v.

GIGA WATT, INC., et al.,  
  
Defendants.

CASE NO.: 2:17-cv-00438-SMJ

CLASS ACTION

**DECLARATION OF BETH E.  
TERRELL IN SUPPORT OF JOINT  
STIPULATION AND [PROPOSED]  
ORDER REGARDING  
PLAINTIFF'S VOLUNTARY  
DISMISSAL**

DECLARATION OF BETH E. TERRELL  
IN SUPPORT OF JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING PLAINTIFF'S  
VOLUNTARY DISMISSAL

1 I, Beth E. Terrell, certify as follows:

2 1. I am a member of the law Terrell Marshall Law Group PLLC and  
3 counsel for Plaintiff in this matter.

4 2. I submit this declaration in support of the parties' Joint Stipulation  
5 And [Proposed] Order Regarding Plaintiff's Voluntary Dismissal.

6 3. Plaintiff has not issued notice of this action under the Private  
7 Securities Litigation Reform Act of 1995, 15 U.S.C. § 77z-1(a)(3)(A).

8 4. Based on my review of the applicable facts and law with respect to the  
9 running of the statute of limitations as to claims of the proposed class, proposed  
10 class members would not be prejudiced because they have (1) ample time to file  
11 another action, and (2) this present action was settled in a matter of weeks.

12 5. In settling this matter, there has been no collusion between the parties,  
13 nor has there been any concessions made by Plaintiff or Plaintiff's counsel, with  
14 respect to the proposed class' claims.

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed at Seattle, Washington on this 19th day of January, 2018.

17 By: /s/ Beth E. Terrell, WSBA #26759  
18 Beth E. Terrell, WSBA #26759

CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on January 19, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Barry M. Kaplan, WSBA #8661  
Gregory L. Watts, WSBA #43995  
Attorneys for Defendants Giga Watt, Inc.  
and Giga Watt, Pte., Ltd.  
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DATED this 19th day of January, 2018.

TERRELL MARSHALL LAW GROUP PLLC

By: /s/ Beth E. Terrell, WSBA #26759

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DECLARATION OF BETH E. TERRELL  
IN SUPPORT OF JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING PLAINTIFF'S  
VOLUNTARY DISMISSAL - 2